

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1, 3-6, 8-11, 13-18, 20-28, 30-36, and 41-48 are pending in the present application, Claim 11 having been amended. Support for the amendments to Claim 11 is believed to be self-evident from the originally filed application. Applicant respectfully submits that no new matter is added.

In the outstanding Office Action, Claim 11 was rejected under 35 U.S.C. §112, second paragraph; Claims 1, 11, 28, 30, 33, 34, 41, 43, and 47 were rejected under 35 U.S.C. §103(a) as unpatentable over Nishio (U.S. Patent Publication No. 2005/0251569) in view of Denman et al. (U.S. Patent No. 6,745,240, hereinafter Denman); Claim 35 was rejected under 35 U.S.C. §103(a) as unpatentable over Nishio in view of Denman, and further in view of Carcerano et al. (U.S. Patent No. 6,308,205); Claims 9, 10, 14, 15, 36, 42, 44, and 48 were rejected under 35 U.S.C. §103(a) as unpatentable over Nishio in view of Denman, and further in view of Frazier et al. (U.S. Patent No. 6,981,025, hereinafter Frazier); Claims 3-5, 13, 21-24, 26, 31, 32, and 45 were rejected under 35 U.S.C. §103(a) as unpatentable over Nishio in view of Denman, and further in view of Duvvury (U.S. Patent No. 6,917,626); Claims 8, 16, 20, 27, and 46 were rejected under 35 U.S.C. §103(a) as unpatentable over Nishio in view of Denman, and further in view of Duvvury and Frazier; and Claims 6, 17, 18, and 25 were rejected under 35 U.S.C. §103(a) as unpatentable over Nishio in view of Denman and Duvvury, and further in view of Carcerano.

With respect to the rejection of Claim 11 under 35 U.S.C. §112, second paragraph, the informality noted in the Office Action is corrected. Accordingly, this ground of rejection is overcome.

Applicant respectfully traverses the rejection of Claim 1. Claim 1 recites, *inter alia*,



a management unit configured to manage the plurality of other image forming devices and said image forming device; and

a selection unit, provided in said image forming device, configured to select a managing image forming device to manage the plurality of other image forming devices and said image forming device,

wherein the managing image forming device is selected by said selection unit out of a group including the plurality of other image forming devices and said image forming device.

Applicant respectfully submits that amended Claim 1 patentably distinguishes over Nishio and Denman, taken alone or in proper combination.

Nishio describes a system where a master agent communicates with one or more subagents.<sup>1</sup> The master agent may be disposed in a network controller or a printer controller.<sup>2</sup> However, the sections of Nishio relied upon by the Office pertain to a single device. In other words, the master agent and the subagents are disposed in a single device.

This is supported by Nishio's Fig. 1. An examination of Nishio's Fig. 1 shows that the network controller (including the master agent) and the printer controller (including the subagents) are part of a same printing device. The Office should note that Fig. 1 only includes one network connection, which means that the network controller and the printer controller are in the same printing device.

Thus, the relationship between the network controller and the printer controller of Nishio does not equate to a management unit configured to manage the plurality of other image forming devices and said image forming device. The master agent of Nishio is not managing other image forming devices. On the contrary, the master agent only interacts with subagents within a common printing device.

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<sup>1</sup> Nishio, Fig. 11.

<sup>2</sup> Nishio, paragraph [0132].



While paragraph [0010] of Nishio suggests that the network controller can be external to the printing device, there is no teaching that the network controller is disposed in another printing device. The network controller, even if disposed external to the printing device, is not a management unit disposed in an image forming device that manages other image forming devices.

Furthermore, paragraphs [0020] and [0021] of Nishio describe a single network device that has a master agent and subagents. These paragraphs of Nishio do not suggest that only one network device has a master agent and other network devices have subagents.

The outstanding Office Action errs when stating at page 3:

...wherein only one of the image processing device in the communication group includes a master agent while other image processing devices include subagents. In Nishio's system the master agent image processing device has ability of control other subagents image processing devices.

As explained above, the master agent and the subagents are in the same device. A master agent in a first device does not control subagents in another device. If the Office should disagree, it is respectfully requested that the Office provide a detailed explanation as to why in an Advisory Action so as to facilitate the appeal process.

Thus, contrary to the position taken at page 3 of the outstanding Office Action, Nishio does not disclose or suggest the claimed "a management unit configured to manage the plurality of other image forming devices and said image forming device."

Page 3 of the outstanding Office Action acknowledges that Nishio does not explicitly disclose the claimed "selection unit." However, Denman does not cure this deficiency in Nishio.



Denman describes a system where interconnected nodes perform parallel processing.<sup>3</sup>

This system implements a method of selecting one of the interconnected nodes as a coordinator that controls the configuration of the parallel processing system.<sup>4</sup>

Denman describes using a voting process to configure the parallel processing system.

Denman states “[e]ach node in the system votes for a node that it believes is the best candidate to control the configuration process.”<sup>5</sup> This voting process does not involve image forming devices.

Furthermore, Denman does not describe a management relationship between plural separate image forming devices. Rather, Denman describes an internal process between a CPU and memory. Denman does not disclose or suggest that the nodes are separate image forming devices.

Thus, Denman does not disclose or suggest the claimed “a selection unit, provided in said image forming device, configured to select a managing image forming device to manage the plurality of other image forming devices and said image forming device.”

Thus, Applicants respectfully submit that Claim 1 (and any claims dependent thereon) patentably distinguish over Nishio and Denman taken alone or in proper combination. Claims 11, 21, and 28 recite elements similar to those of Claim 1. Claims 11, 21, and 28 (and any claims dependent thereon) patentably distinguish over Nishio and Denman taken alone or in proper combination, for at least the reasons stated for Claim 1.

Addressing each of the further rejections, each of the further rejections is also traversed by the present response as no teachings in any of the further cited references to Carcerano, Frazier, and Duvvury can overcome the above-noted deficiencies of Nishio and Denman. Accordingly, it is respectfully requested that those rejections be withdrawn for similar reasons as discussed above.

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<sup>3</sup> Denman, abstract.

<sup>4</sup> Denman, abstract.

<sup>5</sup> Denman, col. 2, lines 2-4.



Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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